

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

WSOU INVESTMENTS, LLC d/b/a BRAZOS LICENSING AND DEVELOPMENT,

Plaintiff,

C.A. No. 20-1228-CFC C.A. No. 20-1229-CFC

C.A. No. 20-1231-CFC

C.A. No. 20-1232-CFC

C.A. No. 20-1233-CFC

V.

XILINX, INC.,

Defendant.

DECLARATION OF STUART A. SHANUS IN SUPPORT OF PLAINTIFF WSOU INVESTMENTS, LLC d/b/a BRAZOS LICENSING AND DEVELOPMENT'S OPPOSITION TO XILINX, INC.'S MOTION TO TRANSFER

- I, Stuart A. Shanus, hereby declare and state as follows:
- 1. I currently serve as President of WSOU Investments, LLC d/b/a
 Brazos Licensing and Development ("WSOU"), in Waco, Texas. I have been
 President of WSOU since in or about August 2017.
- 2. I submit this Declaration in Support of WSOU's Opposition to Defendant Xilinx, Inc.'s ("Xilinx") Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404. The statements set forth below are true and correct to the best of my knowledge and belief based upon information available to WSOU and, if called to do so, I could and would testify competently as to the same.

- 3. WSOU is a limited liability company that is incorporated in Delaware. WSOU has been incorporated in Delaware since July 2017. WSOU's principal place of business is located at 605 Austin Avenue, Suite 6, Waco, Texas 76701.
- 4. WSOU is the assignee of all right, title, and interest in U.S. Patent Nos. 6,784,653, 7,068,950, 7,613,938, 7,903,971, and 9,312,838 (collectively, "Patents-in-Suit").
- 5. WSOU's documents concerning the Patents-in-Suit and its business operations are located in or accessible from its Waco office as well as the office of WSOU's vendor, Network Consultants, located at 703 Willow Grove Road, Waco, Texas 76712.
- 6. The WSOU representatives most knowledgeable about WSOU's licensing practices include Craig Etchegoyen and me. He and I are willing to appear for trial in Wilmington, Delaware.
- 7. WSOU does not maintain any offices, facilities, or employees in the Northern District of California.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on the 20th day of January, 2021.

Stuart A. Shanus